

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA                         )  
  )  
  )  
v.    )    CRIMINAL No. 14-158  
  )  
ZUNED SUNESRA                                      )

**DEFENDANT ZUNED SUNESRA'S UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO MOVE FOR REVOCATION OF DETENTION ORDER**

Defendant Zuned Sunesra by and through his undersigned counsel submits this Unopposed Motion for Enlargement of Time to Move for Revocation of Detention Order, as follows:

1.       On November 20, 2014, the parties appeared before Chief United States Magistrate Judge Maureen P. Kelly for a hearing on Defendant's Motion for Pretrial Release on Conditions.
2.       On November 24, 2014, at the continuance of the detention hearing, Chief Magistrate Judge Kelly issued an Order of Detention Pending Trial.
3.       The Bail Reform Act affords the right to move for revocation of a detention order. 18 U.S.C. § 3145(b).
4.       Parties generally have fourteen days to appeal a United States Magistrate Judge's ruling pursuant to Federal Rule of Criminal Procedure 59(a).
5.       Counsel for Defendant Zuned Sunesra has conferred with the assigned Assistant U.S. Attorney regarding a 30 day extension of time within which to file a motion for revocation of the Order of Detention Pending Trial, until on or before January 7, 2015.
6.       Assistant United States Attorney Eric Rosen does not oppose a 30 day extension and has authorized the undersigned to represent the government's position to the Court.

WHEREFORE, Defendant Zuned Sunesra respectfully requests a thirty day extension of time within which to file a motion for revocation of Chief United States Magistrate Judge Kelly's November 24, 2014 Order of Detention.

Respectfully submitted,

/s/ Charles Kelly

Christopher R. Hall, Esquire (PA ID No. 64912)  
SAUL EWING LLP  
1500 Market Street, 38<sup>th</sup> Floor  
Philadelphia, PA 19102  
Tel.: (215) 972-7777  
Fax: (215) 972-7725  
[chall@saul.com](mailto:chall@saul.com)

Charles Kelly, Esquire (Pa ID No. 51942)  
Michael J. Joyce, Esquire (PA ID No. 311303)  
SAUL EWING LLP  
One PPG Place, Suite 3010  
Pittsburgh, PA 15222  
Tel.: (412) 209-2500  
Fax: (412) 209-2590  
[ckelly@saul.com](mailto:ckelly@saul.com)  
[mjoyce@saul.com](mailto:mjoyce@saul.com)

*Counsel for the Defendant, Zuned Sunesra*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this Unopposed Motion for Enlargement of Time to Move for Revocation of Detention Order has been served on this 4th day of December, 2014, upon the following parties via the Court's CM/ECF System, and is otherwise available for viewing and downloading on the CM/ECF System:

Eric Rosen, Esq.  
Conor Lamb, Esq.  
United States Attorneys' Office  
700 Grant Street, Suite 4000  
Pittsburgh, PA 15219  
*(Counsel for the United States of America)*

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Thomas Livingston, Esq.  
Federal Public Defender  
Western District of Pennsylvania  
1500 Liberty Center  
1001 Liberty Avenue  
Pittsburgh, PA 15222-3714  
*(Counsel for Defendant, Taimur Khan)*

/s/ Charles Kelly  
Christopher R. Hall, Esquire (PA ID No. 64912)  
SAUL EWING LLP  
1500 Market Street, 38<sup>th</sup> Floor  
Philadelphia, PA 19102  
Tel.: (215) 972-7777  
Fax: (215) 972-7725  
chall@saul.com

Charles Kelly, Esquire (Pa ID No. 51942)  
SAUL EWING LLP  
One PPG Place, Suite 3010  
Pittsburgh, PA 15222  
Tel.: (412) 209-2500  
Fax: (412) 209-2590  
ckelly@saul.com

*Counsel for the Defendant, Zuned Sunesra*